

**American Chemistry Council
American Electronics Association
California Chamber of Commerce
California Grocers Association
California League of Food Processors
California Manufacturers and Technology Association
California Retailers Association
California Women for Agriculture
Can Manufacturers Institute
Chemical Industry Council of California
Consumer Specialty Products Association
Grocery Manufacturers/Food Products Association
Industrial Environmental Association
Proctor & Gamble
The Soap and Detergent Association
The Society of the Plastics Industry
Western Plant Health Association
Western States Petroleum Association**

June 5, 2007

Secretary Linda Adams
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95814

RE: Initial Comments – CalEPA Green Chemistry Initiative

Dear Secretary Adams:

The above listed organizations appreciate the opportunity to provide initial comments relative to the California Environmental Protection Agency's (CalEPA) Green Chemistry Initiative ("Initiative"). Our organizations represent many of California's leading industries and employers. Collectively, we fully support science and risk based chemicals management policies that simultaneously protect health and the environment, assure product safety and promote innovation in the marketplace in California. We hope that the Initiative will enable all stakeholders to explore various issues and ideas that can result in public policy that advances health, environmental protection and economic growth.

As a first step, we agree that this Initiative should begin with an initial baseline assessment of existing programs in place not only in California but at the federal and international level as well. Many programs – both voluntary and regulatory – promote advances in chemical technologies, govern the production, distribution and use of

chemicals, encourage pollution prevention, and foster research into less hazardous substances. Furthermore, robust chemical hazard and toxicity data information is publicly available for many chemicals and more information will be available in the coming months and years. This Initiative should build on existing statutory programs, voluntary initiatives, and data collection and dissemination efforts. By doing so, we can ensure that future policies are built on a solid foundation and operate as efficiently, effectively, and in a fiscally sound manner for public and private sector stakeholders.

We also support your statement that this “...strategy, and the policy it champions, must have at its core and be governed by sound science.” Advancements in science make possible product innovations that meet consumer needs, while increasing knowledge about the safety of chemical products and protecting the environment. As this Initiative moves ahead, we will advocate that rigorous scientific methodologies that provide objective and reproducible results are the cornerstone of any future “green chemistry” policies. The adherence to sound scientific methodologies helps to ensure policymakers are informed by the best available information and objective processes for dealing with uncertainties.

As this Initiative is implemented, we believe that data, assessments, and other scientific investigations should be evaluated using a weight-of-evidence analysis. This analysis should consider all relevant and reliable data, giving greater weight to studies that reflect the best available science. Nevertheless, when data for risk assessments are unavailable or uncertain, we collectively support the use of conservative safety factors and other measures in making decisions as appropriate after a full evaluation of all credible scientific information.

Finally, a consistent theme that seems to permeate discussions of “green chemistry” includes suggestions of mandating “safer chemical alternatives” or “non-toxic chemical substitutes.” Often times, it is suggested that chemicals can be presumed to be either “toxic” or “non-toxic,” “harmful” or “non-harmful,” irrespective of the potential for or degree of exposure. This assumption is not supported from a scientific perspective.

A science-based assessment that evaluates human health and environmental considerations, performance, and cost and feasibility must include an examination of traditional and alternative technologies, materials and processes. Incentive-based approaches can allow California companies to more easily and effectively share this knowledge, best management practices, and opportunities.

Our industries and employees appreciate your leadership in undertaking a comprehensive, science-based approach to this complex issue. We are eager to work with you to identify our existing base of knowledge, identify potential science-based policy opportunities and implement programs that protect human health and the environment while fostering economic growth. If you have any questions or comments, please feel free to contact Tim Shestek of the American Chemistry Council at 916-448-2581 or via email at tim_shestek@americanchemistry.com.